

THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
NO. 5:18-CR-452-1FL

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	JOINT MOTION TO CONTINUE
	)	ARRAIGNMENT AND EXTEND FILING
LEONID ISAAKOVICH TEYF,	)	DEADLINES
	)	
Defendant.	)	

Defendant Leonid Teyf, jointly with the United States, by and through the United States Attorney for the Eastern District of North Carolina, moves this Court for an order continuing arraignment, extending the filing deadline for pre-trial motions, and continuing the case from its currently scheduled trial date of April 8, 2019.

Mr. Teyf has been charged in a Second Superseding Indictment filed on February 6, 2019, with money laundering, bribery, “murder for hire,” possession of an illegal firearm, and various immigration-related violations. Discovery is substantial, and includes recordings in a foreign language, transcript preparations of those recordings, numerous digital media such as phones and computers, and thousands of pages of records, and will require ongoing analysis of substantial financial records. Indeed, discovery is ongoing, particularly as relates to digital media. Mr. Teyf and the government are also seeking records and information from abroad.

The parties had hoped to soon propose to the Court a specific pre-trial schedule addressing various deadlines which would assist in a timely and efficient trial proceeding. Such deadlines would include those for final transcript preparations, designations of various portions of transcripts and recordings as trial exhibits, and for response and objections to such designations, deadlines for naming experts, as well as for pre-trial motions. However, co-defendant Tatyana Teyf's current uncounseled status delays provision of such proposed timelines with this motion.

In that light, the parties move jointly to remove the case from motions and trial calendar at this time, and allow the parties 20 days following notice of appearance by counsel for co-defendant Tatyana Teyf to file proposed deadlines and trial schedule<sup>1</sup>.

Mr. Teyf's arraignment is currently scheduled for March 25, 2019. The deadline for the filing of pre-trial motions is March 11, 2019, with responses due March 18, 2019. In light of the above grounds, the United States and defendant Teyf respectfully request that all current deadlines and hearing set in this matter be terminated, and the parties have 20 days following notice of appearance by counsel for Tatyana Teyf to provide the court with their proposals for various deadlines and trial.

Defendant Teyf, agrees to waive any objections under the Speedy Trial Act. 18 U.S.C. § 3161(h).

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<sup>1</sup> While counsel for the remaining defendants were not contacted for the instant motion, their motions and trial dates set further out than defendant Teyf's, they will be contacted for their positions on the broader proposed trial deadlines.

Respectfully submitted, this 11th day of March, 2019.

/s/ James P. McLoughlin, Jr.

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## CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of March, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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